

CASE 5:18-CV-00659-0167

FILED

9-27-18
SEP 28 2018CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY *[Signature]*
DEPUTY CLERK

TO WHOM IT MAY CONCERN

I was in constant communication with the attorney. He is saying the time elapsed to file an responsive pleading. The whole time I was working with him so I wouldn't get sued. I even offered an out of court settlement of \$1,500 and he wouldn't take it. This is completely being disputed and sent a formal response to the court on August 14th 2018 when the attorney became completely unreasonable.

He is also trying to sue me on another case for the same things. I am disputing that also. Offered him a settlement of \$1,500 on that one too. He refused. He doesn't want to hear anything I say.

Please do not put a judgement against me on either of these.

Charges are not true. I can provide proof like I did to him

CASE 5:18-CV-00659-0167

CASE 5:18-CV-00785-FB

Scott Franoz

DEKALB COUNTY SOLUTIONS

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**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

BRENDA BECERRA,

Plaintiff,

v.

5:18-cv-00659-OLG

DEKALB COUNTY SOLUTIONS, INC.,

Defendant.

**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT AGAINST
DEKALB COUNTY SOLUTIONS, INC. ON A SUM CERTAIN**

NOW comes BRENDA BECERRA ("Plaintiff"), by and through her attorneys, Sulaiman Law Group, Ltd. ("Sulaiman") and pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, requesting that this Honorable Court enter a Default Judgment against DEKALB COUNTY SOLUTIONS ("Defendant") and in support thereof, stating as follows:

I. FACTUAL BACKGROUND

1. On June 29, 2018, Plaintiff filed her Complaint for Relief Pursuant to the Fair Debt Collection Practices Act ("FDCPA") and Texas Debt Collection Act ("TDCA"). The basis of Plaintiff's Complaint is that Defendant violated the FDCPA and TDCA through its collection activities.
2. On July 12, 2018, Paul Pankiewicz, a certified process server, effectuated service on Defendant by serving Donna Farris, who is authorized to accepted service on behalf of Defendant.
3. On August 2, 2018, Defendant's time to file a responsive pleading elapsed.

AO 440 (Rev. 06/12) Summons in a Civil Action

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS**

CAITLYN C. CAREY,
Plaintiff

V.

Civil Action No. **5:18-CV-00785-FB**

DEKALB COUNTY SOLUTIONS, INC., ET AL.,
Defendant

SUMMONS IN A CIVIL ACTION

TO: **DeKalb County Solutions, Inc.**
C/O REGISTERED AGENT
KENDA J JESKE
502 E MAIN STREET
GENOA, IL 60135

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States Agency, or an office or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Nathan Charles Volheim
Sulaiman Law Group, Ltd.
2500 South Highland Avenue, Suite 200
Lombard, IL 60148

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

JEANNETTE J. CLACK

CLERK OF COURT

s/AMY E. JACKSON

DEPUTY CLERK



ISSUED ON 2018-08-07 13:55:47

DCS
PO BOX 447
SYCAMORE, IL 60178

RECEIVED

SEP 28 2018

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY

CV 9

Western District of Texas
Executive Office of the Clerk
727 E. Cesar E. Chavez Blvd.
Suite 500
San Antonio Texas 78206

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